

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**NATIONAL RIFLE ASSOCIATION OF  
AMERICA,**

## Plaintiff and Counter-Defendant

**V.**

**ACKERMAN MCQUEEN, INC.,**

**Defendant and Counter-Plaintiff,**

**and**

**MERCURY GROUP, INC., HENRY  
MARTIN, WILLIAM WINKLER, and  
MELANIE MONTGOMERY,**

## Defendants.

[illegible]

**Civil Action No. 3:19-cv-02074-G**

## PLAINTIFF'S OBJECTIONS TO DEFENDANTS' EXHIBIT LIST

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DEFENDANT NATIONAL RIFLE  
ASSOCIATION OF AMERICA**

Exhibit No.	Date	Description	Bates	Objection(s)
001	4/30/2017	2017 Services Agreement between NRA and AMc	AM 00000162	
002	5/6/2018	Amendment #1 to Services Agreement	AMc-056592	
003	5/11/2018	NRA v. Cuomo, et al., Original Complaint (N.D. N.Y.)		
004	5/29/2018	NRA v. Lockton, Original Complaint (E.D. Virginia)		
005	7/20/2018	NRA v. Cuomo, et al., Amended Complaint (N.D. N.Y.)		
006	9/13/2018	Order revoking of <i>pro hac vice</i> (E.D. Virginia)		<p>FRE 403 – Precludes the admission of evidence that wastes time or is more prejudicial than probative; i.e., whose probative value is outweighed by the possibility of unduly prejudicing the jury – in this case against Plaintiff and Plaintiffs’ attorneys.</p> <p>FRE 401, 402 – Precludes admission of irrelevant evidence, which is evidence that has no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.</p> <p>FRE 404 – Precludes admission of evidence that constitutes improper character evidence.</p>

007	4/12/2019	NRA v. AMc, Original Complaint (Virginia State Court - CL19001757)		
008	5/22/2019	NRA v. AMc, Original Complaint (Virginia State Court - CL19002067)		
009	6/19/2019	NRA v. Col. North, Original Complaint (NY State Court)		
010	8/30/2019	NRA v. AMc, et al., Original Complaint (N.D. Tex.)		
011	9/5/2019	NRA v. AMc, Original Complaint (Virginia State Court - CL19002886)		
012	8/6/2020	NYAG v. NRA, et al., Original Complaint (NY State Court)		
013	2/23/2021	NYAG v. NRA, et al., Wayne LaPierre Verified Answer		
014	5/11/2021	Order Granting Motions to Dismiss (B.K. N.D. Tex.)		
015		Audit Documents	AMc-0028792 - AMc-0034631	Exhibit 15 appears to be a disaggregated collection of copies of materials produced in a hard copy format, certain of which appear to be generated from electronic platforms in use by AMc. This “exhibit” contains over 2,600 pages combining hundreds of different documents. The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.
016	3/30/2017	Email from Steve Hart to Bill Winkler	Hart Ex. 17	
017	5/23/2018	NRA Supplier Meeting Agenda	NRA-AMc_00200788	FRE 901 – Proper authentication of handwritten notes and financial statements requires testimony by person with requisite knowledge that the notes and

				statements are an accurate depiction of the intended subject.
018	4/14/2017	Email from Bill Winkler to Steve Hart	AMcTX-0065465	
019	4/20/2017	Email from Bill Winkler to Steve Hart	Hart Ex. 19	
020	1/16/2018	Email from Josh Powell to Andrew McKenna, Tony Makris, and Colleen Gallagher	AMc-035712	FRE 401, 402 – Precludes admission of irrelevant evidence, which is evidence that has no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.
021	3/28/2018	Correspondence from John Frazer to Lacey Cremer and Melanie Montgomery	AMcTX-0000009	
022	4/24/2019	Letter from Wayne LaPierre to John Frazer and Charles Cotton	NRA-AMc_00200450	
023	4/13/2018	Email from Bill Brewer to Angus McQueen	AMcTX-00037265	
024	4/23/2018	Email from Tony Makris to Steve Hart and others	AMc-044429	
025		2019 Budget for C. Spray	NRA-AMc_00200742	
026	5/11/2018	Email from Bill Winkler to Woody Phillips	AMcTX-00000027	
027	5/21/2018	Email from Melanie Montgomery to Bill Winkler and Susan LaPierre	AMcTX-00002090	FRE 802 – Hearsay FRE 401, 402 – Precludes admission of irrelevant evidence, which is evidence that has no tendency to make the existence of any fact that is of consequence to the determination of the

				action more probable or less probable than it would be without the evidence.
028	5/25/2018	Email from Josh Powell to Tony Makris	AMcTX-00065337	FRE 401, 402 – Precludes admission of irrelevant evidence, which is evidence that has no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.
029		2018 Budget – Revised	NRA-AMc_00200745	
030	7/10/2018	Email from Steve Hart to Melanie Montgomery	Hart Ex. 6	
031	7/10/2018	Email from Steve Hart to Melanie Montgomery	AMcTX-00041549	
032	2/6/2019	Emails between Jessica Bradley and Bill Winkler	AMc-057912	The NRA reserves the right to object to the use of this document at trial as inadmissible hearsay (FRE 802) in the event Jessica Bradley does not testify at trial.
033	7/13/2018	Email from Sonya Rowling to Rick Tedrick	NRA-AMc_00063924	
034	7/13/2018	Letter from Jay Madrid to Bill Brewer	AMcTX-00065338	
035	4/28/2019	Email from Steve Hart to Michael Volkov	NRA-AMc_00185755	
036	8/6/2018	Email from Tony Makris to Melanie Montgomery, Henry Martin, and Angus McQueen	AMcTX-00065357	
037	8/7/2018	Letter from Jay Madrid to Bill Brewer	AMcTX-00065369	
038	8/8/2018	Letter from Bill Brewer to Jay Madrid	AMcTX-00065352	FRE 106 – A document must be admitted in its entirety.

				The document is referencing attachments. Accordingly, the attachments should, in fairness, be considered part of the correspondence and should be admitted along with said correspondence.
039	8/8/2018	Letter from Woody Phillips to Bill Winkler	NRA-AMc_00068307	
040	8/8/2018	Correspondence from Woody Phillips to Bill Winkler	NRA-AMc_00068309	
041	1/19/2019	Email from Susan Dillon to Sarah Rogers	NRA_AM_FRA_0013029	
042	8/13/2018	Letter from Bill Winkler to Woody Phillips	NRA-AMc_00063983	
043	8/14/2018	Letter from Woody Phillips to Bill Winkler	NRA-AMc_00057152	
044	8/15/2018	Letter from Bill Winkler to Woody Phillips	NRA-AMc_00057176	
045	8/17/2018	Email from Travis Carter to Andrew Arulanandam and Jennifer Baker	AMcTX-00065360	
046	8/22/2018	Letter from Stephen Ryan to Bill Brewer	AMcTX-00065340	
047	8/27/2018	Letter from Bill Winkler to Woody Phillips	NRA-AMc_00071260	
048	8/28/2018	Letter from Bill Winkler to Woody Phillips	AMc-058391	
049	8/29/2018	Letter from Woody Phillips to Bill Winkler	NRA-AMc_00057263	
050	9/24/2018	Angus McQueen Draft Letter to Wayne LaPierre	AMc-058564	
051	9/4/2018	Letter from Bill Winkler to Woody Phillips	AMc-057593	

052	9/5/2018	Letter from Jay Madrid to Bill Brewer	AMcTX-00065354	
053	9/6/2018	Email from Stephen Ryan to Bill Brewer	AMcTX-00065362	
054	9/12/2018	Letter from Bill Winkler to Woody Phillips	AMcTX-00000200	
055	9/12/2018	Letter from Bill Brewer to Jay Madrid	AMcTX-00065346	
056	9/13/2018	Email from John Frazer to Gina Betts and Sarah Rogers	NRA-AMc_00064053	
057	9/13/2018	Email from D. Reno to L. Supernaugh	NRA-AMc_00068484	
058	9/14/2018	Email from Sarah Rogers to Gina Betts and John Frazer	NRA-AMc_00057268	
059	9/17/2018	Email from Lacey Cremer to Craig Spray, Melanie Montgomery, and Nader Tavangar	AMc-031560	
060	9/21/2018	Email from Lisa Supernaugh to AMc	AMc-028858	<p>The NRA objects on the grounds that parts of the document are not easily legible (FRE 106 – A document must be admitted in its entirety).</p> <p>The NRA requests that a legible, higher-resolution copy of the document is used.</p>
061	9/24/2018	Letter from Bill Winkler to Craig Spray	NRA-AMc_00057300	
062	9/25/2018	Letter from Jay Madrid to Steve Hart	AMcTX-00065322	
063	9/25/2018	Letter from Wayne LaPierre to Bill Winkler	NRA-AMc_00057314	
064	9/25/2018	Letter from Josh Powell to Bill Winkler	NRA-AMc_00057315	
065	9/25/2018	Letter from Bill Winkler to Josh Powell	NRA-AMc_00057329	

066	9/26/2018	Email from Steve Hart to Tony Makris	Hart Ex. 11	
067	9/28/2018	Letter from Bill Winkler to Josh Powell	AMc-031718	The NRA objects on the grounds that the proposed budget adjustments attachment that is attached to the letter is illegible (FRE 106 – A document must be admitted in its entirety).  The NRA requests that a legible, higher-resolution copy of the document is used.
068	10/2/2018	Letter from Bill Winkler to Josh Powell	AMc-043863	
069	10/2/2018	Letter form Richard Sayles to Steve Hart	NRA-AMc_00160786	
070	10/4/2018	Correspondence from Josh Powell to Bill Winkler	NRA-AMc_00057377	
071	10/4/2018	Correspondence from Wayne LaPierre to Bill Winkler	NRA-AMc_00060919	
072	10/5/2018	Letter from Bill Winkler to Craig Spray	AMc-034913	
073	10/6/2018	Letter from Craig Spray to Bill Winkler		
074	10/9/2018	Letter from Bill Winkler to Craig Spray	AMc-058072	
075	10/11/2018	Email between Steve Hart and Tony Makris	Hart Ex. 14	
076	10/16/2018	Correspondence from Wayne LaPierre to Bill Winkler	NRA-AMc_00090636	
077	10/31/2018	Email from Todd Grable to AMc Team	AMc-037921	
078	10/31/2018	Email from Craig Spray to Bill Winkler and Melanie Montgomery	AMc-059342	



079	11/2/2018	Email from Craig Spray to Melanie Montgomery	AMcTX-00000333	
080	11/16/2018	Email from Nicole Reaves to Lacey Cremer and Bill Winkler	AMcTX-00065308	
081	2/4/2016	Email from Trisha Parker to Melanie Montgomery	AMcTX-00065138	
082	11/26/2018	Email from Craig Spray to Melanie Montgomery and Lacey Cremer	AMcTX-00000776	
083	12/6/2018	Text Message from Craig Spray to Melanie Montgomery	AMcTX-00064686	<p>This document is hearsay and inadmissible pursuant to FRE 802.</p> <p>This document does not indicate the identity of the sender, the recipient or the date of the purported communications. The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.</p> <p>The NRA objects to the use of this document at trial as it was not produced in its native form.</p> <p>FRE 401, 402 – Precludes admission of irrelevant evidence, which is evidence that has no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.</p> <p>This document is not probative to adjudicating a material disputed fact</p>

				relevant to any claim or defense in this lawsuit.
084	12/14/2018	Correspondence between Steve Hart and Tony Makris	AMc-044420	
085	12/20/2018	Email from Bill Winkler to Craig Spray	NRA-AMc_00112506	
086	12/21/2018	Letter from Sarah Rogers to Jay Madrid	NRA-AMc_00068870	
087	1/4/2019	Letter from Jay Madrid to Steve Hart	NRA-AMc_00065378	
088	1/7/2019	Email from Oliver North to AMc	AMc-039381	The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.
089	1/10/2019	Letter from Stephen Ryan to Steve Hart	Hart Ex. 23	
090	1/17/2019	Email between Stephen Ryan, John Frazer, and Steve Hart	NRA-AMc_00058457	
091	1/21/2019	Emails between Stephen Ryan, Steve Hart, and John Frazer	NRA_AM_FRA_0002614	
092	1/22/2019	Emails between Stephen Ryan, Steve Hart, and John Frazer	NRA-AMc_00058512	
093	1/30/2019	Email from John Frazer to Stephen Ryan	NRA-AMc_00058587	
094	1/31/2019	Emails between John Frazer, Stephen Ryan, and Gina Betts	NRA-AMc_00058659	
095	2/3/2019	Email from John Frazer to Gina Betts	NRA_AM_FRA_0000668	
096	2/6/2019	Email from Susan Dillon to FRA Employee	NRA_AM_FRA_0001437	

097	2/6/2019	Email from Jessica Bradley to Bill Winkler	NRA_AM_FRA_0001449	The NRA reserves the right to object to the use of this document at trial as inadmissible hearsay (FRE 802) in the event Jessica Bradley does not testify at trial.
098	2/6/2019	Email from Bill Winkler to Jessica Bradley	NRA_AM_FRA_0001451	
099	2/8/2019	Emails between Bill Winkler and Jessica Bradley	NRA_AM_FRA_0001490	
100	2/8/2019	Correspondence from John Frazer to Stephen Ryan and Gina Betts	NRA-AMc_00064546	
101	2/11/2019	Letter from Stephen Ryan to John Frazer	AMcTX-00065329	
102	2/12/2019	Letter from John Frazer to Stephen Ryan	AMcTX-00065330	
103	2/6/2022	In the Matter of Dana Loesch v. AMc: Partial Final Award	AMcTX-0339422	<p>The NRA objects to this document as AMc and its counsel failed to disclose any documents concerning this arbitration during discovery.</p> <p>As a result of its tactical partial disclosure of this “Partial Final Award,” AMc should be precluded from using this document at trial. The NRA should be permitted to use it in any way it sees fit.</p>
104	2/18/2019	Emails between Jessica Bradley, Bill Winkler, and Gina Betts	NRA_AM_FRA_0001954	The NRA reserves the right to object to the use of this document at trial as inadmissible hearsay (FRE 802) in the event Jessica Bradley does not testify at trial.
105	7/29/2015	Email from Melanie Hill to Trisha Parker	AMcTX-00065414	

106	2/20/2019	Email from John Frazer to Stephen Ryan and Gina Betts	NRA-AMc_00059149	
107	2/22/2019	Email from Steve Hart to Tony Makris	Hart Ex. 36	
108	2/22/2019	Emails from Susan Dillon to Sarah Rogers	NRA_AM_FRA_0002037	
109	2/26/2019	Letter from Oliver North, Richard Childress, and Carolyn Meadows to Wayne LaPierre	N2-00050	<p>The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.</p> <p>The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).</p>
110	2/26/2019	Emails between Steve Hart and Anthony Makris	AMcTX-00011318	
111	2/26/2019	Emails between Stephen Ryan and John Frazer	NRA-AMc_00059246	
112	2/26/2019	Correspondence from Wayne LaPierre to Oliver North	NRA-AMc_00064573	
113	3/4/2019	Letter from John Frazer to Stephen Ryan	Frazer Ex. 30	
114	3/7/2019	Email from Melanie Montgomery to Craig Spray	AMc 001275	
115	3/7/2019	Email from Stephen Ryan to John Frazer	NRA-AMc_00059288	

116	7/7/2021	Email from Trisha Parker to Melanie Montgomery	AMcTX-65143	<p>An exhibit must be admitted in its entirety (FRE 106). Here, in the lower email, there is a reference to an “attached” affidavit from Fox News, which we do not see. That affidavit must be attached so that the jury can see the complete picture.</p> <p>The NRA will withdraw this objection if/when the referenced affidavit has been attached.</p>
117	3/8/2019	Email from Stephen Ryan to John Frazer	NRA-AMc_00059305	
118	3/11/2019	Email from Tony Makris to John Frazer	AMc-035260	
119	3/11/2019	Message from Wayne LaPierre to NRA Board	AMc-035262	
120	3/12/2019	Correspondence from Jay Madrid to John Frazer	AMcTX-00065364	
121	3/14/2019	Letter from John Frazer to Jay Madrid	AMc-035264	
122	3/4/2019	2019 Billing Schedule for C. Spray	NRA-AMc_00200736	
123	3/21/2019	Correspondence from Brendan Sullivan to Bill Brewer	OLN00208	
124	3/22/2019	Email from Oliver North to John Frazer	Meadows Ex. 2	<p>The NRA objects to Defendants’ use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North’s testimony and communications at trial.</p>

				The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).
125	3/22/2019	Correspondence from Oliver North to Bill Brewer	NRA-AMC_00069015	The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.
126	3/22/2019	Correspondence from Oliver North to NRA Audit Committee	North Ex. 14	The NRA objects to the use of this document at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).  This document is also illegible in the form presented.
127	3/25/2019	Letter from John Frazer to Stephen Ryan	AMcTX-00065371	
128	3/25/2019	Correspondence from John Frazer to Oliver North	Frazer Ex. 42	
129	3/25/2019	Correspondence from Bill Brewer to Brendan Sullivan	OLN00214	
130	11/2/2018	Email from Craig Spray to Melanie Montgomery and Bill Winkler	NRA-AMc_00057619	
131	3/26/2019	Letter from John Frazer to Stephen Ryan	AMcTX-00065332	
132	3/29/2019	Letter from Wayne LaPierre to NRA Board	NRA-AMc_00191401	

133	3/31/2019	Correspondence from Oliver North to Wayne LaPierre	OLN00216	<p>The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.</p> <p>The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).</p>
134	4/3/2019	Correspondence from Wayne LaPierre to Oliver North	OLN0221	<p>The NRA objects to Defendants' use of this document at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).</p>
135	4/4/2019	Email from Steve Hart to Tony Makris	AMcTX-00011450	
136	4/8/2019	Correspondence from Oliver North to Wayne LaPierre	OLN00225; NRA-AMc_00199755	<p>The NRA objects to Defendants' use of this document at trial. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).</p>
137	4/9/2019	Correspondence from Oliver North to Wayne LaPierre	OLN00173	<p>The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.</p>

138	4/10/2019	Email from Andrew Arulanandam to Melanie Montgomery	AMcTX-00000581	
139	4/11/2019	Correspondence from Oliver North to John Frazer and Charles Cotton	NRA-AMc_00069094; NRA-AMc_00059415	
140	4/12/2019	Email from Charles Cotton to Oliver North	NRA-AMc_00059433	
141	5/7/2019	An Internal Memo Raises New Questions About Self-Dealing at the NRA by Mark Spies		
142	4/15/2019	Message from Wayne LaPierre to NRA Board	DB_0216	
143	4/15/2019	Email from Danny Hakim to Andrew Arulanandam	NRA-AMc_00069104	
144	4/30/2019	Concur Expense Report	AMcTX-00067318	This “exhibit” contains 365 pages combining dozens individual documents. The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.
145	4/18/2019	Correspondence from Oliver North and Richard Childress to John Frazer and Charles Cotton	OLN00185; NRA-AMc_00200725	<p>The NRA objects to Defendants’ use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North’s testimony and communications at trial.</p> <p>The amount of attorney’s fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).</p>



146	4/18/2019	Text Message from Allen West to Millie Hallow	OLN00367	The NRA objects to AMc's use of this exhibit at trial. This document is a compilation of text messages which were never produced in native form.
147	4/22/2019	Letter from Wayne LaPierre to Mark Dycio	AMcTX-00065334	
148	4/22/2019	Letter from Wayne LaPierre to Steve Hart	AMc-035391	
149	4/22/2019	Email from Steve Hart to NRA Executives and Board Members	OLN00015	
150	4/22/2019	Letter from Bill Winkler to Craig Spray	NRA-AMc_00069698	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
151	4/22/2019	Letter from Bill Winkler to Tyler Schropp	LaPierre Ex. 21	The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's

				<p>objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
152	4/22/2019	Letter from Bill Winkler to Craig Spray	AMc 001304	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
153	4/22/2019	Message from Wayne LaPierre to NRA Board	OLN00076	
154	4/24/2019	Email from Millie Hallow to Oliver North	NRA-AMc_00061214	
155	4/25/2019	Email from Oliver North to John Frazer	NRA-AMc_200692	<p>The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.</p>

156	4/25/2019	Letter from Wayne LaPierre to NRA Board	NRA-AMc_00161960	
157	4/25/2019	Correspondence from Oliver North to NRA Board and Executive Council	OLN00093	<p>The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.</p> <p>The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).</p>
158	4/25/2019	Correspondence from Oliver North to NRA Executive Committee	NRA-AMc_00200692	<p>The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.</p> <p>The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).</p>
159	4/25/2019	Email from Eric Van Horn to Caitlin Fiantt, John DaSilva, Cameron Collins, and Woody Arenas	AMc-041806	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's</p>

				<p>objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
160	4/26/2019	Email from Steve Hart to John Frazer and Wayne LaPierre	NRA-AMc_00059559	
161	4/27/2019	Email from John Frazer to NRA Board	NRA-AMc_00140486	
162	4/27/2019	Statement from Wayne LaPierre to NRA Board	OLN00106	
163	5/5/2019	Email from Wayne LaPierre to Melanie Montgomery	NRA-AMc_00064984	
164	5/6/2019	Letter from Bill Winkler to Craig Spray	AMc 001309	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>

165	5/9/2019	Email from Andrew Arulanandam to Melanie Montgomery and Henry Martin	NRA-AMc_00059652	
166	5/10/2019	Email from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00086579	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
167		Projected Increases to NRA Fees	AMcTX-0067704	
168	5/13/2019	Email from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00124518	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log</p>

				during the discovery period, when the NRA could have made use of it.
169	5/22/2019	Letter from Carolyn Meadows and Charles Cotton to NRA Members	NRA-AMc_00199649	
170	5/24/2019	Correspondence from Andrew Arulanandam to Melanie Montgomery	NRA-AMc_00059838	
171	5/29/2019	Notice of Termination of Services Agreement from AMc to NRA	NRA-AMc_00059931	
172	5/30/2019	Letter from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00059946	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
173	6/3/2019	Email from Bill Winkler to Craig Spray	NRA-AMc_00065094	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p>

				AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
174	6/3/2019	Email from Bill Winkler to Craig Spray	NRA-AMc_00059982	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
175	6/3/2019	Email from Bill Winkler to Craig Spray	AMcTX-00065350	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to</p>

				provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
176	6/18/2019	Emails from David Schertler to Andrew Arulanandam, Melanie Montgomery, Angus McQueen, and Revan McQueen	Arulanandam Ex. 6	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
177	6/25/2019	Correspondence from Andrew Arulanandam to Dana Loesch	NRA-AMc_0019094	
178	6/25/2019	Notice of Termination of Services Agreement from Andrew Arulanandam	NRA-AMc_00060185	
179	7/22/2019	Letter from NRA Board Members to Carolyn Meadows, John Frazer, and NRA Board	AMcTX-00065468	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p>



				AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
180	9/27/2019	Letter from Melanie Montgomery to Andrew Arulanandam		
181	10/25/2019	Letter from John Frazer to Gina Betts, Bill Winkler, and Rick Tedrick	AMcTX-00045606	
182	7/22/2021	All Invoices – NR Analysis	AMcTX-00067978	Authentication (FRE 901) – the exhibit requires testimony that it accurately represents what it purports to be.  Hearsay (FRE 802)
183	12/12/2019	Text Messages from Bill Brewer	GRANT0161	The NRA objects as this document was not produced in its native form.  These are pictures of purported text messages. The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.
184	6/5/2019	Email from Nader Tavangar to Rick Tedrick and Duane Reno	AMc-042077	The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.

				AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
185	2/4/2021	Order Denying Motion to Transfer ( <i>In re National Rifle Association Business Expenditures</i> )		Relevance (FRE 401-402). This is a procedural order from a different litigation that is irrelevant to this litigation.
186	1/14/2021	Letter from Brewer Attorneys & Counselors to John Frazer	NRA-BK-00060928	The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).
187	4/5/2018	Email from Travis Carter to NRA	AMc-035792	Relevance (FRE 401-402).  The fact that the Brewer firm did or did not issue a statement related to any particular pending matter has no bearing on any disputed fact relevant to a claim or defense in this case.
188	10/6/2016	2017 Budget Planning Document	NRA-AMc_00057337	
189	2/8/2019	Email from Bill Winkler to Jessica Bradley	AMc-057923	
190	4/23/2018	Deal Points for Oliver North Employment Agreement	OLN00398	
191	5/15/2018	Employment Agreement by and among AMc and Oliver North	AMc-056595	

192	5/21/2018	Invoice No. 001 from WBB Investments, LLC	AMcTX-00036157	
193	8/22/2019	NRA Shakes Up Legal Team Amid Intensifying War by Robert Costa		
194	7/6/2021	Dorsey & Whitney LLP Invoices (Dallas Action)	AMcTX-00065644	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
195	9/8/2018	NRA Report of the Audit Committee	OLN00178	
196	2/8/2019	Email from Bill Winkler to Jessica Bradley	NRA-AMc_00064536	
197	10/24/2018	NRA Presidential Advisors Agenda	NRA-AMc_00057543	FRE 401-402 – This document does not help to resolve any disputed material fact relevant to a claim or defense.
198	12/4/2018	Revised 2019 Budget	AMcTX-00065137	
199	10/4/2018	Letter from Josh Powell to Bill Winkler	NRA-AMc_00057377	
200	1/1/2019	Amendment 1 to Oliver North Employment Agreement	AMc-059822	
201	1/4/2019	NRA Board Meeting Presentation		

202	1/18/2019	FRA/NRA Agreement	Trahar Ex. 1A	
203	2/5/2019	List of AMc Employees who worked on NRA Account	NRA-AMc_00193859	
204	3/4/2019	Spreadsheet Prepared by Melanie Montgomery	AMcTX-000065136	
205	6/8/2021	Dorsey & Whitney LLP Invoices (Loesch Arbitration)	AMc-TX-00066503	The NRA objects to this document as AMc and its counsel failed to disclose any documents concerning this arbitration during discovery.
206	3/21/2019	Memo from Morgan Lewis Bockius LLP to NRA Officers	NRA-BK-00177963	This document concerns legal fees charged by the NRA's counsel. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).
207	4/15/2019	NRA Invoices and Related Emails	Supernaugh Ex. 8	
208	4/29/2019	Email from Andrew Arulanandam to Fischer	NRA-AMc_00059584	
209	10/5/2018	Letter from Craig Spray to Bill Winkler	AMcTX-00000296	
210	7/15/2019	Memorandum prepared by Emily Cummins	LaPierre Ex. 16	FRE 403 – More Prejudicial Than Probative.
211	1/4/2020	Invoice for Professional Services from Brewer Attorneys & Counselors	NRA-BK-00061283	This document concerns legal fees charged by the NRA's counsel. The amount of attorney's fees charged by its counsel is irrelevant to the case and has no probative value to any disputed issue of material fact. It only serves to unduly prejudice the jury (FRE 401, 402, 403).
212	1/10/2020	FRA Updated Privilege Log		

213		NRA Second Amended Privilege Log		
214	1/11/2016-12/19/2016	American Express Credit Card Statement of Tyler Schropp	AM 00000987	
215	9/9/2019	Dorsey & Whitney LLP (Professional Fundraising Counsel Registrations)	AMcTX-00066490	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
216	4/17/2019	Article titled "Secrecy, Self-Dealing and Greed at the NRA"		
217	4/26/2019	Article titled "NRA's Wayne LaPierre Says He is Being Extorted, Pressured to Resign" in The Wall Street Journal		
218	4/26/2019	Email from David Valinski	Frazer Ex. 66	
219	5/6/2019	Article titled "Advocacy as Art: Lawyers Must Engage in Issues and Crisis Management"		<p>Relevance (FRE 401-402).</p> <p>An article authored by counsel for the NRA lacks probative value.</p>
220		Zillow Listing	LaPierre Ex. 27	
221	12/5/2018-1/14/2021	Invoices for Professional Services from Brewer Attorneys & Counselors	NRA-BK-00060718	<p>Relevance (FRE 401-402)</p> <p>Waste of Time (FRE 403).</p>

				Professional invoices from Plaintiff's counsel have no relevance to this litigation.
222	5/1/1999	Services Agreement by and among NRA and AMc	NRA-AMc_00048503	
223		2015 Freestyle Network Screenshot	AMcTX-00067936	
224		NRA Media Projects Screenshot	AMcTX-00067937	
225	1/3/2017	Invoice from Corporate America Aviation, Inc.	Cotton Ex. 10	
226	1/2/2018	Email from Josh Powell to Tony Makris	AMc-029887	
227		AMc Invoice Backup Spreadsheet	AMcTX-00067933	The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.
228	11/9/2018	Email from Nicole Reaves to Bill Winkler, Melanie Montgomery, and Lacey Cremer	AMc-TX0065297	Hearsay (FRE 802).
229		Attachment from Nicole Reeves		The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.
230	4/13/2017	AMc Invoice No. 148177	NRA-NYAG-00013071	
231	2018	2018 NRA Budget	AMcTX-00065392	
232		Media Buy Transaction Ledger	AMcTX-00067934	The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.

233	10/16/2018	2018 / 2019 Budget Comparison	AMcTX-00065376	
234	4/15/2019-7/22/2021	Invoices from 2019-2021	AMcTX-00065401	
235	10/11/2018	Letters from Bill Winkler to Oliver North and from Jay Madrid to Steve Hart	AMcTX-00065396	
236	1/2/2018	Email from Josh Powell to Tony Makris	AMcTX-00065335	
237	12/6/2016	2017 Budget	AMcTX-00065394	
238	11/18/2015	2016 Budget	AMcTX-00065395	
239	5/13/2019	Letter from Melanie Montgomery to Andrew Arulanandam	AMcTX-00003309	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
240	1/24/2019	Email from Melanie Montgomery to Craig Spray	AMc-001227	
241	10/9/2018	NRATV 2018 YTD: Analytics Executive Overview	AMc-002700	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p>

				<p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
242	1/1/2018 - 3/31/2018	NRATV Q1 2018: Analytics & Valuation	AMc-002713	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>



243	10/1/2016- 12/20/2017	NRATV Analytics	AMc-002741	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
244	1/1/2018 - 10/3/2018	NRATV YTD Q3'18: Analytics	AMc 002772	<p>FRE 901 -- Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the</p>

				data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.
245	10/1/2016-8/31/2017	NRATV Analytics Discussion	AMc 002818	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
246	n/a	NRATV 2018 Vision Discussion	AMc 002835	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference</p>

				data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.
247	4/7/2019	NRATV 2019 Update	AMc 002844	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
248	n/a	The Power of NRATV – Crafting and Owning a Narrative	AMc 002853	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute</p>

				original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.
249	n/a	The Clenched Fist of Truth	AMc 002929	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
250	n/a	NRA America's Most Patriotic Brand	AMc 002956	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p>

				<p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
251	n/a	NRATV Commentators – 2017 Metrics	AMc-039158	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>

252	n/a	NRATV LOVE AT FIRST SHOT 2017 Metrics	AMc-039162	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
253	n/a	NRATV Cam & Company – 2018 Metrics	AMc-040053	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is</p>

				mined from the social media accounts, to which the NRA has also been denied access.
254	n/a	NRATV Monetization Report	AMcTX-00000763	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
255	5/31/2019	Email from Andrew Arulanandam to Melanie Montgomery, Lacey Cremer, Bill Winkler, Wayne LaPierre, Craig Spray, and John Frazer	NRA-AMc_00059956	
256	5/5/2019	Email from Nader Tavangar to Rick Tedrick and Duane Reno	AMc-042077	The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.

				AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
257	4/16/2019	Email to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	AMcTX-00019288	
258	6/12/2019	Email to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079124	
259	11/19/2020	NRA 2020 IRS Form 990		
260	2/22/2019	Email from Craig Spray to Nader Tavangar and Bill Winkler	AMc-001257	
261	10/8/2018	Letter from Bill Winkler to Craig Spray	AMc-058072	
262	1/1/2018	Employment Agreement by and among Dana Loesch and AMc	AMc 000055	
263	2/22/2021	NRA Organizational Chart		
264	4/22/2019	Letter from Bill Winkler to Wayne LaPierre	NRA-AMc_0091615	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log</p>



				during the discovery period, when the NRA could have made use of it.
265	4/22/2019	Letter from Bill Winkler to Wayne LaPierre	NRA-AMc_00091621	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
266	n/a	List of NRA Audit Committee Top Concerns	NRA-AMc_00063924	
267	5/7/2018	Text Messages from the Phone of Woody Phillips	AMcTX-00065643	
268	5/3/2018	Text Messages from the Phone of Woody Phillips	AMcTX-00065642	
269	7/13/2018	Email from Nader Tavangar to Woody Phillips, Lisa Supernaugh, and Duane Reno	AMc-036282	
270	2/20/2018	Pay Stubs and Electronic Deposit Stubs	NRA-AMc_00052128	
271	6/7/2018	Email from Craig Spray to Woody Phillips	NRA-AMc_00051582	

272	5/30/2019	Email from M. Erstling to Craig Spray, Sonya Rowling, and Lisa Supernaugh	NRA-AMc_00125414	
273	4/2/2019	Email from Nader Tavangar to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079067	
274	3/4/2019	Email from Nader Tavangar to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079029	
275	6/5/2019	Letter from Andrew Arulanandam to Bill Winkler	NRA-AMc_00059992	
276	6/6/2019	Email from David Schertler to Andrew Arulanandam	NRA-AMc_00060001	
277	6/4/2019	Email from David Schertler to John Frazer	NRA-AMc_00059986	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
278	6/3/2019	Email from Bill Winkler to Craig Spray	NRA-AMc_00059983	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on</p>

				<p>January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
279	6/7/2019	Email from Andrew Arulanandam to David Schertler	NRA-AMc_00060115	
280	6/10/2019	Email from David Schertler to Andrew Arulanandam	NRA-AMc_00060118	
281	6/11/2019	Email from Andrew Arulanandam to David Schertler and Melanie Montgomery	NRA-AMc_00060122	
282	6/14/2019	Email from Andrew Arulanandam to David Schertler	NRA-AMc_00060125	
283	6/27/2019	Letter from David Schertler to Andrew Arulanandam		<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log</p>

				during the discovery period, when the NRA could have made use of it.
284	10/10/2019	Email from Nader Tavangar to Craig Spray and others regarding October invoice	NRA-AMc_00127308 - 309	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
285	n/a	Summary of NRA Billing	AMcTX-00067978 - 68006	
286	11/10/2016	NRA 2015 IRS Form 990		
287	9/18/2017	NRA 2016 IRS Form 990		
288	11/5/2018	NRA 2017 IRS Form 990		
289	11/14/2019	NRA 2018 IRS Form 990		
290	11/17/2020	NRA 2019 IRS Form 990		
291.00	10/15/2021	Amended Expert Report of Daniel L. Jackson		
291.01	1/1/2018	Loesch Agreement	AMc-000055	
291.02	6/21/2019	Mutual of Omaha Billing Statement	AMc-001335	The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until

				<p>January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.03	12/24/2020	List of Late Payments	AMc-002628	
291.04	9/4/2018	Valinski Employment Agreement	AMc-036766	
291.05	5/1/2019	AMc Production Invoice No. 166346	AMc-041862	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.06	5/1/2019	AMc Production Invoice No. 166340	AMc-041863	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on</p>

				<p>January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.07	5/1/2019	AMc Production Invoice No. 166339	AMc-041869	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.08	5/17/2019	AMc Production Invoice No. 166804	AMc-041994	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's</p>

				<p>objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.09	6/1/2019	AMc Production Invoice No. 167037	AMc-042051	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.10	5/1/2019	AMc Production Invoice No. 166340	AMc-042136	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p>

				AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
291.11	9/10/2018	Mutual of Omaha Billing Statement	AMc-057610	
291.12	7/17/2018	Prudential EFT Notice	AMc-058265	
291.13	4/15/2019	AMc Production Invoice No. 166104	AMcTX-00019289	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.14	12/12/2018	Virginia Lease Agreement	AMcTX-00036891	
291.15	10/18/2019	CenturyLink Disconnect Request	AMcTX-00045364	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p>



				AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
291.16	7/16/2019	AT&T Account Statement	AMcTX-00045368	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.17	10/8/2019	CenturyLink Invoice No. 85349561	AMcTX-00045395	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log</p>

				during the discovery period, when the NRA could have made use of it.
291.18	4/30/2018	Cisco Lease Agreement	AMcTX-00045403	
291.19	5/8/2018	Dell Financial Services Lease Agreement	AMcTX-00045408	
291.20	3/22/2018	iland Internet Solutions Work Order	AMcTX-00045414	
291.21	8/1/2019	Rent Invoice No. 208	AMcTX-00045456	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.22	9/11/2019	AT&T Invoice No. 2854499405	AMcTX-00045457	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to</p>

				provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
291.23	9/19/2019	AT&T Invoice No. 5048360507	AMcTX-00045459	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.24	10/19/2018	Email from Lacey Duffy to Trey Rick and Mark Ackerman	AMcTX-00045461	
291.25	1/15/2019	AMc Production Invoice No. 163943	AMcTX-00045467	
291.26	12/2/2019	AMc Production Invoice No. 171144	AMcTX-00045468	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to</p>

				provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
291.27	12/2/2019	AMc Production Invoice No. 171498	AMcTX-00045469	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.28	12/2/2019	AMc Production Invoice No. 170464	AMcTX-00045470	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>

291.29	6/12/2019	AMc Production Invoice No. 167453	AMcTX-00045496	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.30	7/9/2019	AMc Production Invoice No. 168025	AMcTX-00045502	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.31	10/10/2019	AMc Production Invoice No. 170388	AMcTX-00045503	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications</p>

				<p>created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.32	9/12/2019	AMc Production Invoice No. 169524	AMcTX-00045504	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.33	5/30/2017	Colorado Springs Third Amendment to Lease	AMcTX-00045510	
291.34		TLUX CORP Invoice No. 1009	AMcTX-00045515	
291.35	10/2/2019	Colorado Springs Commercial Sublease	AMcTX-00045516	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications</p>

				<p>created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.36		Attorney Correspondence and Legal Invoices	AMcTX-00046071-46167	
291.37	10/18/2019	A-1 Freeman Moving & Storage Invoice No. O- 296-19/71615	AMcTX-00046168	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.38	12/30/2019	A-1 Freeman Moving & Storage Invoice No. O- 283-19/74590	AMcTX-00046169	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until</p>

				<p>January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.39	11/8/2019	Homewood Suites Receipt	AMcTX-00046170	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.40	11/7/2019	AMc Expense Report	AMcTX-00046171	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's</p>



				<p>objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.41	11/8/2019	Account Statement	AMcTX-00046172	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.42	2/4/2020	Concur Expense Report	AMcTX-00046173	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p>

				AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
291.43	3/3/2020	Concur Expense Report	AMcTX-00046179	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.44	11/5/2019	Concur Expense Report	AMcTX-00046199	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log</p>

				during the discovery period, when the NRA could have made use of it.
291.45	11/14/2019	Concur Expense Report	AMcTX-00046213	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.46	3/20/2020	Move it All Services Receipt	AMcTX-00046257	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>

291.47	3/12/2020	UPS Store Receipt	AMcTX-00046259	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.48	10/29/2019	Xerox Invoice No. 162889933	AMcTX-00046260	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.49	10/29/2019	Xerox Invoice No. 162890034	AMcTX-00046261	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications</p>

				<p>created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.50	10/29/2019	Xerox Invoice No. 162890544	AMcTX-00046262	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.51	10/29/2019	Xerox Invoice No. 162890548	AMcTX-00046263	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with</p>

				<p>court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.52	5/30/2017	Colorado Springs Third Amendment to Lease	AMcTX-00046265	
291.53		TLUX CORP Invoice No. 1009	AMcTX-00046269	
291.54	1/13/2021	Email from Tyson Hartshorn to JJ Treadwell, Bill Winkler, and Mike Dennehy	AMcTX-00046274	
291.55	12/31/2019	Gaedeke Group Operation Expenses Reconciliation	AMcTX-00046286	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.56	7/19/2016	McKinney Avenue First Amendment to Office Lease	AMcTX-00046290	

291.57	9/22/2017	North Union Street Seventh Amendment to Lease Agreement	AMcTX-00046341	
291.58	3/17/2020	North Union Street Termination of Lease Agreement	AMcTX-00046350	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.59	1/6/2020	Colonial Parking Invoice No. 2821477	AMcTX-00046366	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>

291.60	6/27/2019	Email from Caile Turner to Bill Winkler, Brandon Winkler, JJ Treadwell, and Clay Turner	AMcTX-00046367	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.61	7/1/2020	Letter from Nadine Goering (Niebur Development) to AMc	AMcTX-00046368	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.62	3/20/2020	Stream Realty Invoice No. SWDC26819.0	AMcTX-00046369	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications</p>



				<p>created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.63	2/6/2020	Colonial Parking Invoice No. 2848731	AMcTX-00046370	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.64	3/6/2020	Colonial Parking Invoice No. 1837035	AMcTX-00046371	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with</p>

				<p>court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.65		COBRA Premium Reconciliations	AMcTX-00046372	
291.66		Parking Details	AMcTX-00046373	
291.67	10/17/2019	CenturyLink Invoice No. 85513654	AMcTX-00046374	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.68	1/6/2020	Leave Severance	AMcTX-00046381	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with</p>

				<p>court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.69		Employee Census	AMcTX-00046382	
291.70	5/3/2019	Axis Corporate Security Invoice No. #AM 0591-1	AMcTX-00046389	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.71	6/12/2019	AMc Production Invoice No. 167453	NRA-AMc_00079126	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's</p>

				<p>objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.72	6/12/2019	AMc Production Invoice No. 167448	NRA-AMc_00079132	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.73	4/30/2017	2017 Services Agreement	NRA-AMc_00050600	
291.74	5/6/2018	2018 Amendment to Services Agreement	AMc-056592	
291.75	5/1/1999	1999 Services Agreement	NRA-AMc_00048503	
291.76	5/15/2018	Oliver North Employment Agreement	AMc-056595	
291.77	1/1/2019	Amendment to Oliver North Employment Agreement	AMc-059822	
291.78	5/29/2019	Letter from Revan McQueen to Andrew Arulanandam	NRA-AMc_00059931	The NRA objects to AMc's use of this document at trial. AMc failed to produce

				<p>a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
291.79	6/25/2019	Letter from Andrew Arulanandam to Revan McQueen	NRA-AMc_00060185	
291.80	3/10/2021	Topic No. 751 Social Security and Medicare Withholding Rates _ Internal Revenue Service		
291.81	3/8/2021	Topic No. 759 Form 940 – Employer's Annual Federal Unemployment (FUTA) Tax Return –		
292	7/1/2021	Rebuttal Expert Report by Dr. Richard Bergin		<p>The entire report is unsworn and therefore constitutes inadmissible hearsay.</p> <p>The NRA reserves the right to challenge testimony concerning the opinions stated in this report on the basis that it fails to meet the standards for admissible expert testimony.</p>
292.01		NRATV Video Analytics Dashboard: Solution Overview	AMc-002656	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p>

				<p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
292.02	10/9/2018	NRATV 2018 YTD: Analytics Executive Overview	AMc-002700	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>

292.03	3/31/2018	NRATV Q1 2018: Analytics & Valuation	AMc-002713	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
292.04	10/3/2018	NRATV YTD Q3'18 Talent Earned Media Valuation: Mass Media Approach	AMc-002786	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is</p>

				mined from the social media accounts, to which the NRA has also been denied access.
292.05	8/31/2017	NRATV Analytics Discussion	AMc-002818	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
292.06	4/7/2019	NRATV 2019 Update	AMc-002844	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the</p>



				NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.
292.07	8/31/2017	The Clenched Fist of Truth	AMc-002929	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
292.08	12/20/2017	NRATV: America's Most Patriotic Team in News	AMc-002957	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata --</p>

				including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.
292.09		NRATV Q3 2017 YTD Metrics	AMc-002974	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
292.10	12/31/2017	NRATV 2017 Metrics	AMc-039154	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and</p>

				<p>accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship.</p> <p>Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
292.11	12/31/2017	NRATV 2017 Metrics	AMc-039158	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship.</p> <p>Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
292.12	12/31/2017	NRATV 2017 Metrics	AMc-039162	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p>

				<p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
292.13	13/31/2018	NRATV 2018 Metrics	AMc-040053	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>

292.14	4/25/2019	Email from Eric Van Horn to NRA	AMc-041806	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
292.15	4/15/2019	NRATV Q1 2019 Metrics	AMc-041807	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>

292.16	5/1/2019	NRATV 2019 Update	AMcTX-00003282	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p> <p>Additionally, the following objections apply:</p> <p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the</p>
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				data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.
292.17		The Power of NRATV: Crafting and Owning a Narrative	AMcTX-00045966	<p>FRE 901 – Lack of Proper Authentication</p> <p>FRE 802 – Hearsay</p> <p>The document is based on data that cannot be verified as complete, true, and accurate. First, the .pdf files are insufficient because they do not constitute original, native files with full metadata -- including date and authorship. Additionally, the presentations reference data from the Dashboard, to which the NRA has not had access sufficient to verify the integrity and accuracy of the data. Furthermore, the Dashboard data is mined from the social media accounts, to which the NRA has also been denied access.</p>
292.18	4/10/2019	Email from Andrew Arulanandam to Melanie Montgomery and Revan McQueen	NRA-AMc_00059409	
292.19	5/9/2019	Email from Andrew Arulanandam to Melanie Montgomery and Henry Martin	NRA-AMc_00059652	
292.20	5/13/2019	Email from Andrew Arulanandam to Melanie Montgomery and Nader Tavangar	NRA-AMc_00124518	
292.21		Data file for PIP Dashboard	PIP-00000214_native	The NRA objects to the use of this exhibit at trial. This exhibit is a file which has

				<p>been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.22		Data file for PIP Dashboard	PIP-00000215_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.23		Data file for PIP Dashboard	PIP-00000216_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient</p>



				<p>access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.24		Data file for PIP Dashboard	PIP-00000218_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.25		Data file for PIP Dashboard	PIP-00000219_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a</p>

				probative value. (FRE 401, 402, 403, 901)
292.26		Data file for PIP Dashboard	PIP-00000220_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.27		Data file for PIP Dashboard	PIP-00000246_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.28		Data file for PIP Dashboard	PIP-00000287_native	The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a

				<p>pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.29		Data file for PIP Dashboard	PIP-00000288_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.30		Data file for PIP Dashboard	PIP-00000289_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient</p>

				<p>access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.31		Data file for PIP Dashboard	PIP-00000290_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.32		Data file for PIP Dashboard	PIP-00000291_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a</p>

				probative value. (FRE 401, 402, 403, 901)
292.33		Data file for PIP Dashboard	PIP-00001190_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.34		Data file for PIP Dashboard	PIP-00001196_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.35		Data file for PIP Dashboard	PIP-00001283_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a</p>

				<p>pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.36		Data file for PIP Dashboard	PIP-00001294_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.37		Data file for PIP Dashboard	PIP-00001322_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient</p>

				<p>access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.38		Data file for PIP Dashboard	PIP-00001339_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.39		Data file for PIP Dashboard	PIP-00001348_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a</p>

				probative value. (FRE 401, 402, 403, 901)
292.40		Data file for PIP Dashboard	PIP-00002807_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.41		Data file for PIP Dashboard	PIP-00002890_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.42		Data file for PIP Dashboard	PIP-00004232_native	The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a



				<p>pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.43		Data file for PIP Dashboard	PIP-00004365_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.44		Data file for PIP Dashboard	PIP-00004392_native	<p>The NRA objects to the use of this exhibit at trial. This exhibit is a file which has been altered from its native form into a pdf format which is both unusable and unreliable. The file purports to be from the Dashboard, to which the NRA does not have, and has not had, sufficient</p>

				<p>access to verify or challenge the integrity, completeness, and accuracy of the data.</p> <p>It is more likely to confuse the jury than provide any relevant information of a probative value. (FRE 401, 402, 403, 901)</p>
292.45	5/1/2002	NRA-ILA 2002 NRA Annual Meeting Speech By Wayne LaPierre		
292.46		Vanity Metrics: Definition, How To Identify Them, and Examples		
293.00	10/29/2021	Supplemental Rebuttal Expert Report by Dr. Richard Bergin		<p>The entire report is unsworn and therefore constitutes inadmissible hearsay.</p> <p>The NRA reserves the right to challenge testimony concerning the opinions stated in this report on the basis that it fails to meet the standards for admissible expert testimony.</p>
293.01		2018 and 2019 Budget Comparisons	AMcTX-00065376-95395	
293.02		2018 Budget	AMcTX-00065392	
294.00	7/1/2021	Rebuttal Expert Report of Daniel L. Jackson		<p>The entire report is unsworn and therefore constitutes inadmissible hearsay.</p> <p>The NRA reserves the right to challenge testimony concerning the opinions stated in this report on the basis that it fails to meet the standards for admissible expert testimony.</p>
294.01	1/1/2018	Dana Loesch Employment Agreement	AMc-000055	
294.02	2/23/2016	Email from Melanie Montgomery to Trisha Parker	AMc-000155	

294.03	2/22/2016	Email from Melanie Montgomery to Hayley Holmes	AMc-000177	
294.04	6/1/2019	AMc Production Invoice No. 167037	AMc-042051	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
294.05	5/6/2018	Amendment No. 1 to Services Agreement	AMc-056592	
294.06	5/15/2018	Oliver North Employment Agreement	AMc-056595	
294.07	1/1/2019	Amendment Number One to Oliver North Employment Agreement	AMc-059822	
294.08	4/6/2018	Email from Kelsey Gosdin to Christy DeGiusti, Bill Winkler, and Brandon Winkler	AMcTX-00001636	
294.09	12/31/2016	AMc Consolidated Statement of Income	AMcTX-00053145	
294.10	12/31/2016	AMc Labor Breakdown	AMcTX-00053147	
294.11	12/31/2016	All GL Companies: Corporate Profit & Loss	AMcTX-00053157	

294.12	12/31/2017	AMc Consolidated Statement of Income	AMcTX-00053164	
294.13	12/31/2017	AMc Labor Breakdown	AMcTX-00053166	
294.14	12/31/2017	All GL Companies: Corporate Profit & Loss	AMcTX-00053176	
294.15	12/31/2018	AMc Consolidated Statement of Income	AMcTX-00053183	
294.16	12/31/2018	AMc Labor Breakdown	AMcTX-00053185	
294.17	12/31/2018	All GL Companies: Corporate Profit & Loss	AMcTX-00053196	
294.18	12/31/2019	AMc Consolidated Statement of Income	AMcTX-00053204	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
294.19	12/31/2019	AMc Labor Breakdown	AMcTX-00053206	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's</p>

				<p>objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
294.20	12/31/2019	All GL Companies: Corporate Profit & Loss	AMcTX-00053216	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
294.21	11/25/2019	COGS General Ledger	AMcTX-00053224	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p>

				AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.
294.22	11/30/2019	Invoice General Ledger	AMcTX-00053225	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
294.23	5/1/2019	Invoice Breakdown	AMcTX-00053226	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log</p>

				during the discovery period, when the NRA could have made use of it.
294.24	12/31/2016	Edward Selfridge 2016 W-2	AMcTX-00053241	
294.25	12/31/2016	Ginny Simone 2016 W-2	AMcTX-00053242	
294.26	12/31/2017	Edward Selfridge 2017 W-2	AMcTX-00053243	
294.27	12/31/2017	Virginia Simone 2017 W-2	AMcTX-00053244	
294.28	12/31/2018	Collins Idehen 2018 W-2	AMcTX-00053245	
294.29	12/31/2018	Edward Selfridge 2018 W-2	AMcTX-00053246	
294.30	12/31/2018	Grant Stinchfield 2018 W-2	AMcTX-00053247	
294.31	12/31/2018	Virginia Simone 2018 W-2	AMcTX-00053248	
294.32	12/31/2019	Collins Idehen 2019 W-2	AMcTX-00053249	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
294.33	12/31/2019	Edward Selfridge 2019 W-2	AMcTX-00053250	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's</p>

				<p>objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
294.34	12/31/2019	Grant Stinchfield 2019 W-2	AMcTX-00053251	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
294.35	5/1/1999	Services Agreement	NRA-AMc_00048503	
294.36	4/30/2017	2017 Services Agreement	NRA-AMc_00050600	
294.37	5/7/2018	Minutes of the Meeting of the Board of Directors of the NRA	NRA-AMc_00075497	
294.38	1/13/2018	Minutes of the Meeting of the Board of Directors of the NRA	NRA-AMc_00076056	
294.39	9/8/2018	Minutes of the Meeting of the Board of Directors of the NRA	NRA-AMc_00077292	
294.40	6/12/2019	AMc Production Invoice No. 167453	NRA-AMc_00079126	The NRA objects to AMc's use of this document at trial. AMc failed to produce



				<p>a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
294.41	6/12/2019	AMc Production Invoice No. 167448	NRA-AMc_00079132	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
295	10/15/2021	Supplemental Rebuttal Expert Report of Daniel L. Jackson		<p>The entire report is unsworn and therefore constitutes inadmissible hearsay.</p> <p>The NRA reserves the right to challenge testimony concerning the opinions stated</p>

				in this report on the basis that it fails to meet the standards for admissible expert testimony.
296		Media Buy Transaction Ledger	AMcTX-00067935	The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.
297		PIP Dashboard <a href="https://qlik-sense.am.com">https://qlik-sense.am.com</a> User: qlik-sense/review PW: [confidential]		<p>The NRA objects to AMc's use of this "exhibit." The PIP Dashboard is the property of the NRA and is being wrongfully withheld by AMc and its counsel. This is the subject of the NRA's conversion claim.</p> <p>Because the NRA has not been provided with administrative access to the PIP Dashboard, there is an unreasonable risk that data displayed to the jury will be manipulated or otherwise unreliable.</p>
298	11/11/2019	Dorsey & Whitney LLP Invoices (NRA-Related Government Proceedings)	AMcTX-00046093	<p>The NRA objects to AMc's use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA's objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log</p>

				during the discovery period, when the NRA could have made use of it.
299		2018 Budget – Revised	NRA-AMc_00200745	
300	4/4/2019	McDermott Will & Emery Invoices	AMcTX-00066478	
301	7/31/2018	Email from Craig Spray to Melanie Montgomery, Bill Winkler, and Lacey Cremer	NRA-AMc_00042157	
302	9/21/2018	Email from Lisa Supernaugh to AMc	NRA-AMc_00068513	
303	6/12/2019	Email from Nader Tavangar to Craig Spray, Rick Tedrick, Lisa Supernaugh, and Duane Reno	NRA-AMc_00079124	<p>The NRA objects to AMc’s use of this document at trial. AMc failed to produce a privilege log for communications created during this time period until January 6, 2022. The log produced on January 6, 2022 does not comply with court rules and case law and the NRA’s objection to the log is currently before Judge Toliver.</p> <p>AMc should be penalized for selectively disclosing documents and failing to provide an appropriate privilege log during the discovery period, when the NRA could have made use of it.</p>
304	5/8/2019	Email from Wayne LaPierre to Mark Dycio	NRA-AMc_00199663	
305	1/5/2021	Schertler & Onorato LLP Invoices	AMcTX-00066557	
306	4/16/2019	AMc Text Messages	AMcTX-00339383	The NRA objects to AMc’s use of this exhibit at trial. This document is a compilation of text messages which were never produced in native form. AMc’s

				counsel refuses to provide native versions of these communications.
307	9/14/2021	Letter from Sonya Rowling to NRA Finance Committee		Relevance (FRE 401-402)  More Prejudicial Than Probative (FRE 403)  This is a confidential document which is the property of the NRA. This document was obtained without the consent or authorization of the NRA.
308	6/25/2018	Email from Christy DeGiusti to Bill Winkler	AMc-057237	
309	7/6/2018	Email from Joshua McNear to AMc	AMc-058731	
310	4/26/2018	Email from Erin Kelly to Kelsey Gosdin, Melanie Montgomery, and Lacey Duffy	AMc-059049	
311	2/22/2019	Email from Craig Spray to Nader Tavangar and Bill Winkler	AMc-040505	
312	10/9/2018	2018 NRA Budget	NRA-AMc_00200767	
313	2/27/2019	Email from Craig Spray to Melanie Montgomery, Bill Winkler, and Brandon Winkler	AMcTX-00000410	
314	12/21/2018	Email from Craig Spray to Bill Winkler	AMcTX-00000367	
315	4/6/2018	Email from Kelsey Gosdin to Christy DeGiusti, Bill Winkler, and Brandon Winkler	AMcTX-00001636	
316	4/25/2018	Email from Kelsey Gosdin to Erin Kelly	AMcTX-00004834	
317	4/26/2018	Email from Hayley Holmes to Lacey Duffy, Kari Griffith, Joshua McNear,	AMcTX-00004866	

		Jordan Underwood, and Tyler Petersen		
318	4/27/2018	Email from Kari Griffith to Hayley Holmes, Lacey Duffy, Joshua McNear, Jordan Underwood, and Tyler Petersen	AMcTX-00004873	
319	5/18/2018	Email from Hayley Holmes to Lacey Duffy	AMcTX-00004952	
320	8/27/2019	Letter from Andrew Arulanandam to Revan McQueen	NRA-AMc-TX00000010	
321	8/3/2018	Email from Kari Griffith to FOX News	AMcTX-00005279	
322	11/1/2018	Email from Kelsey Gosdin to Melanie Montgomery, Lacey Duffy, and Jesse Greenberg	AMcTX-00005991	
323	6/30/2016	Email from Erin Kelly to Trisha Parker, Lacey Duffy, and Melanie Montgomery	AMcTX-00271412	
324	7/21/2017	Cumulus-Dallas KPLX-FM / Mid-Mid Spot Times by Account	AMcTX-00335989	
325	7/20/2017	KLUV-FM Spot Details	AMcTX-00335991	
326	7/21/2017	iHeart Media Order No. 1119259331	AMcTX-00335993	
327	7/22/2017	All Regular Spots: Internet, KKDA-AM, KKDA-FM, KRNB-FM	AMcTX-00335996	
328	7/24/2017	Email from Eric Wang to Patrick Kobler	AMcTX-00336002	
329	1/31/2019	EFT Payment to AMc	NRA-AMc_0079008	

330	12/31/2002	AMc "Audit" Process and Findings	NRA-AMc_00089371	
331	12/31/2001	AMc "Audit" Process and Findings	NRA-AMc_00137590	
332	12/31/2014	AMc "Audit" Process and Findings	NRA-AMc_00185505	
333	12/31/2007	AMc "Audit" Process and Findings	NRA-AMc_00185508	
334	12/31/2004	AMc "Audit" Process and Findings	NRA-AMc_00185512	
335	12/31/2005	AMc "Audit" Process and Findings	NRA-AMc_00185515	
336	5/6/2018	Amendment No. 1 to Services Agreement	NRA-AMc_00057325	
337		NRA Travel and Business Expense Reimbursement Policy		
338	8/28/2018	Email from Josh Powell to Melanie Montgomery and Lacey Duffy	AMcTX-00000703	
339	6/30/2018	WBB Investments Account Statement	AMcTX-00002406	
340	5/31/2018	WBB Investments Account Statement	AMcTX-00002407	
341	5/30/2018	Check to WBB Investments No. 633597	AMcTX-00002457	
342	6/14/2018	Check to NRA from WBB Investments	AMcTX-00002459	
343	5/11/2018	Company Agreement of WBB Investments, LLC	AMcTX-00002989	
344	6/28/2018	Letter from Andrew Arulanandam to David Schertler	NRA-AMc_00065184	
345	11/29/2018	EFT Payment to AMc	NRA-AMc_00193696	
346	12/27/2018	EFT Payment to AMc	NRA-AMc_00193703	

347	12/19/2018	EFT Payment to AMc	NRA-AMc_00193736	
348	8/20/2019	Plaintiff's Responses and Objections to Defendant Ackerman McQueen, Inc.'s First Set of Interrogatories		
349	1/7/2019	Email from Lisa Supernaugh to Craig Spray	NRA-AMc_00135444	
350	4/29/2019	NRA Report of the Audit Committee	DB_0013	
351	4/10/2019	Email from Andrew Arulanandam to Melanie Montgomery and Revan McQueen	NRA-AMc_00059409	
352	3/5/2018	Brewer Firm Engagement Letter		
353		Inside the NRA by Joshua L. Powell		Portions of this book will be inadmissible as Hearsay (FRE 802).
354	6/22/2020	Order Denying NRA's Motion to Enter Proposed Protective Order for Non-Parties		
355	4/9/2019	Email from Melanie Montgomery to Andrew Arulanandam	NRA-AMc_00059407	
356	2/8/2016	Wayne LaPierre Financial Disclosure Questionnaire (2016-21)	NRA-NYAG-00009723	Relevance (FRE 401-402) More Prejudicial Than Probative (FRE 403)
357	7/24/2021	AMc's Amended Notice of Intention to Take Oral Deposition of Corporate Representative(s) of the NRA		
358	10/29/2021	NRA Objections and Responses to AMc's First Set of Interrogatories		
359	10/29/2021	NRA Objections and Responses to AMc's First Set of Requests for Admission		

360	7/26/2018	Compliance Meeting Sign-In Sheets	NRA-BK-00058025	
361	3/11/2020	NRA Financial Statements as of December 31, 2019 and 2018		
362	1/30/2020	Letter from John Frazer to Joshua Powell	NRA-NYAG-00052610	
363	9/10/2020	NRA's Amended Response with Counterclaims Against Christopher Cox (CPR File: G-21-05-S		Relevance (FRE 401-402)  More Prejudicial Than Probative (FRE 403)  This is a confidential document from an arbitration proceeding involving the NRA. This document was obtained without the consent or authorization of the NRA.
364		CharityBuzz: Illusions Luxury Yacht Charter		Relevance (FRE 401-402)  More Prejudicial Than Probative (FRE 403)
365	3/7/2019	Email from Melanie Montgomery to Craig Spray and Nader Tavangar	AMc-001275	
366	12/5/2016	Corporate America Aviation, Inc. Invoice No. 010317ROA		Relevance (FRE 401-402)  More Prejudicial Than Probative (FRE 403)
367	5/28/2020	Letter from Richard Childress to NRA Hearing Board		
368	4/29/2019	NRA Points of Concern	NRA-AMc_00059590	Relevance (FRE 401-402)



				More Prejudicial Than Probative (FRE 403)  The NRA reserves the right to object to the admission of this document into evidence at trial subject to a proper authentication pursuant FRE 901.
369	4/10/2019	Email from Melanie Montgomery to Wayne LaPierre	AMcTX_00000845	
370	8/15/2016	Letter from Performance Improvement Partners to Jesse Greenberg	PIP-00003755	
371	3/30/2017	Email from Bill Winkler to Steve Hart	Hart Ex. 17	
372	1/2/2018	Email from Joshua Powell to Tony Makris	Hallow Ex. 14	
373		AMc's 2017 NRA Budget & 2018 Proposed NRA Budget	AMcTX-00064822	
374	6/4/2019	Email from Craig Spray to Lisa Supernaugh	NRA-AMc_00065108	
375	4/1/2018	America's First Freedom		FRE 401-402 – Relevance. The magazine doesn't have anything to do with the disputed factual issues of the case.  FRE 802 – Hearsay.
376	2/3/2022	The Reload: NRA Revenues Cut in Half Since 2018, Legal Spending Spiked in 2021		FRE 401-402 – Relevance. The article doesn't have anything to do with the disputed factual issues of the case.  FRE 802 – Hearsay

377	5/1/2018	Mother Jones: NRA Leader Once Worked for Professor Who Claimed Blacks Were Genetically Inferior		<p>FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value.</p> <p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
378	5/5/2018	Daily Kos: NRA Board member exposed as exassistant of infamous racist William Shockley		<p>FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value.</p> <p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
379	9/26/2019	New York Times: Who Paid for the NRA's Special Projects' Trip to Russia?		<p>FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA due to the association with Russia. There is little if any probative value.</p>

				<p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
380	4/6/2021	The Washington Post: After school shootings, NRA exec sought refuge on 108-foot yacht: ‘Thank God I’m safe’		<p>FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA.</p> <p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
381	8/1/2019	The Washington Post: Three NRA board members resign in latest sign of upheaval at gun rights group		<p>FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA.</p> <p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
382	8/4/2018	New York Times: Beyond the NRA: Maria Butina’s Peculiar Bid for Russian Influence		<p>FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA due to the association with Russia. There is little if any probative value.</p>

				<p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
383	5/11/2021	CNN: Judge dismisses NRA’s bankruptcy petition, allowing New York AG lawsuit to move forward		<p>FRE 403 –More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value.</p> <p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
384	7/30/2019	The New Yorker: New Documents Raise Ethical and Billing Concerns About the NRA’s Outside Counsel		<p>FRE 403 –More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA, and its introduction will outweigh any conceivable probative value.</p> <p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
385	6/9/2019	The Washington Post: NRA money flowed to board members amid allegedly lavish spending by top officials and vendors		<p>FRE 403 –More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA.</p>

				<p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
386	5/7/2019	The New Yorker: An Internal Memo Raises New Questions About Self-Dealing at the NRA		<p>FRE 403 – More Prejudicial Than Probative. This article is designed to prejudice the public – and jury – against the NRA.</p> <p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
387	8/18/2019	The Washington Post: How a hard-charging lawyer helped fuel a civil war inside the NRA		<p>FRE 403 – More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA’s counsel.</p> <p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay and Hearsay Within Hearsay</p>
388	11/30/2018	Wall Street Journal: NRA Awarded Contracts to Firms with Ties to Top Officials		<p>FRE 403 – More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA.</p>

				<p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
389	11/24/2020	The Trace: Ex-NRA Execs Fear Attorney Is Shielding LaPierre at the Group’s Expense		<p>FRE 403 – More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA and NRA’s counsel.</p> <p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
390	3/2/2020	The Trace: The NRA Exodus: Who Left the Organization During a Year of Upheaval		<p>FRE 403 –More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA.</p> <p>FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.</p> <p>FRE 802 – Hearsay</p>
391	9/27/2019	Rolling Stone: Senate Report on NRA/Russia Connections Brands the Gun Group a “Foreign Asset”		<p>FRE 403 –More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA due to associations with Russia.</p>

				FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.  FRE 802 – Hearsay
392	7/29/2021	The New Yorker: How the Head of the NRA and His Wife Secretly Shipped Their Elephant Trophies Home		FRE 403 – More Prejudicial Than Probative. This article contains statements likely to unfairly prejudice the jury against the NRA.  FRE 401-402 – Relevance. This article is not probative to any disputed factual issue.  FRE 802 – Hearsay
393	7/14/2020	Email from Jay Madrid to Michael Collins		FRE 401-402 – Relevance. This is a routine discovery-related email regarding deposition scheduling and has little, if any, probative value.
394		[Intentionally Omitted]		
395		[Intentionally Omitted]		
396		[Intentionally Omitted]		
397		[Intentionally Omitted]		
398		[Intentionally Omitted]		
399		[Intentionally Omitted]		
400	9/24/2019	*Deposition of Wayne LaPierre (Virginia)		
400.1	6/17-18/2020	*Deposition of Wayne LaPierre (NYAG)		
400.2	3/22/2021	*Deposition of Wayne LaPierre (BR – Vol I)		

400.3	3/22/2021	*Deposition of Wayne LaPierre (BR – Vol II)		
400.4	8/21/2021	*Deposition of Wayne LaPierre (Texas)		
400.5	5/3/2020	Wayne LaPierre Declaration		
400.6	8/3/2021	Wayne LaPierre Declaration		
400.7	9/1/2021	Wayne LaPierre Declaration		
400.8	12/20/2021	Wayne LaPierre Declaration		
401	10/2/2019	**Deposition of Andrew Arulanandam (Virginia)		
401.1	8/27/2021	*Deposition of Andrew Arulanandam (30(b)- Texas)		
401.2	4/14/2020	*Andrew Arulanandam Declaration		
401.3	5/1/2020	*Andrew Arulanandam Declaration		
401.4	6/14/2020	*Andrew Arulanandam Declaration		
401.5	8/3/2021	*Andrew Arulanandam Declaration		
401.6	9/1/2021	*Andrew Arulanandam Declaration		
401.7	12/20/2021	*Andrew Arulanandam Declaration		
402	1/31/2022	Deposition of William A. Brewer, III		
403	8/11/2021	Deposition of Skye McQueen Brewer		
404	3/4/2020	Travis Carter Declaration		
404.1	4/14/2020	Travis Carter Declaration		
404.2	5/4/2020	Travis Carter Declaration		
405	2/7/2020	*Deposition of Charles Cotton (Virginia)		
405.1	6/2/2020	*Deposition of Charles Cotton (NYAG)		
405.2	3/27/2021	*Deposition of Charles Cotton (BR – Vol I)		



405.3	3/28/2021	*Deposition of Charles Cotton (BR – Vol II)		
405.4	4/30/2020	*Charles Cotton Declaration		
405.5	8/3/2021	*Charles Cotton Declaration		
405.6	12/20/2021	*Charles Cotton Declaration		
406	7/27/2021	*Deposition of Christopher Cox		
407	7/28/2021	*Deposition of Susan Dillon		
407.1	8/7/2020	*Susan Dillon Declaration		
408	2/12/2020	*Deposition of Michael Erstling (NYAG)		
408.1	8/27/2021	*Deposition of Michael Erstling (Texas)		
408.2	4/29/2020	*Michael Erstling Declaration		
408.3	1/21/2022	*Michael Erstling Declaration		
409	1/16/2020	*Deposition of John Frazer (Virginia)		
409.01	3/15/2021	Deposition of John Frazer (BR)		
409.02	3/18/2021	Deposition of John Frazer (BR)		
409.03	8/19/2021	Deposition of John Frazer (Texas)		
409.04	8/30/2021	Deposition of John Frazer (Texas)		
409.05	10/23/2019	*John Frazer Declaration		
409.06	5/1/2020	*John Frazer Declaration		
409.07	8/3/2021	*John Frazer Declaration		
409.08	8/3/2021	*John Frazer Declaration		
409.09	9/1/2021	*John Frazer Declaration		
409.10	11/29/2021	*John Frazer Declaration		
409.11	12/20/2021	*John Frazer Declaration		
410	8/2/2021	*Todd Grable Declaration		
410.1	9/1/2021	*Todd Grable Declaration		

411	1/10/2021	*Deposition of Millie Hallow (Virginia)		
412	2/4/2020	*Deposition of Steve Hart (Virginia)		
412.1	7/26/2021	*Deposition of Steve Hart (Texas)		
413	12/18/2021	*Declaration of William McLaughlin		
413.1	1/24/2022	*Declaration of William McLaughlin		
414	1/29/2020	*Deposition of Carolyn Meadows		
414.1	8/3/2021	*Carolyn Meadows Declaration		
414.2	8/31/2021	*Carolyn Meadows Declaration		
415	12/18/2021	*Deposition of Oliver North (Virginia/Texas)		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.
415.1	9/15/2021	*Deposition of Oliver North (Texas)		The NRA objects to Defendants' use of this document at trial. The NRA intends to file a motion in limine concerning the use of Mr. North's testimony and communications at trial.
416	8/30/2021	Deposition of Woody Phillips (Texas – Vol I)		
416.1	10/20/2021	Deposition of Woody Phillips (Texas – Vol I)		
417	1/30/2020	*Deposition of Sonya Rowling (NYAG)		
417.1	3/19/2021	*Deposition of Sonya Rowling (BR)		
418	11/2/2020	*Deposition of Tyler Schropp (UWS)		
419	12/20/2021	*Grant Spoffard Declaration		
420	10/3/2019	*Deposition of Craig Spray (Virginia)		

420.1	3/24/2021	*Deposition of Craig Spray (BR)		
420.2	5/4/2020	*Craig Spray Declaration		
421	1/30/2020	*Deposition of Lisa Supernaugh (Virginia)		
422	3/25/2021	*Deposition of Gayle Stanford (BR)		
423	8/12/2021	*Deposition of Rick Tedrick (Texas)		
423.1	12/19/2021	*Rick Tedrick Declaration		
424	9/18/2019	*Deposition of Michael Trahar (Virginia)		
424.1	8/7/2020	*Michael Trahar Declaration		
424.2	11/29/2021	*Michael Trahar Declaration		
425	8/5/2021	*Deposition of Lacey Duffy (Texas)		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.
426	3/24/2021	*Deposition of Tony Makris (BR)		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.
426.1	8/5/2021	*Deposition of Tony Makris (Texas)		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.
426.2	6/3/2021	*Tony Makris Declaration		The NRA objects to AMc's use of this declaration as a substitute for live testimony at trial.
427	8/5/2021	*Deposition of Edmund Martin (Texas)		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.
427.1	6/3/2020	*Edmund Martin Declaration		The NRA objects to AMc's use of this declaration as a substitute for live testimony at trial.
428	8/23/2021	*Deposition of Revan McQueen (Texas)		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.

428.1	3/30/2020	*Revan McQueen Declaration		The NRA objects to AMc's use of this declaration as a substitute for live testimony at trial.
428.2	6/3/2020	*Revan McQueen Declaration		The NRA objects to AMc's use of this declaration as a substitute for live testimony at trial.
428.3	7/6/2021	*Revan McQueen Declaration		The NRA objects to AMc's use of this declaration as a substitute for live testimony at trial.
429	3/31/2021	*Deposition of Melanie Montgomery (BR – 30(b)(6))		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.
429.1	8/4/2021	*Deposition of AMc 30(b)(6) (Texas) (Winkler/Darley/Montgomery)		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.
429.2	8/6/2021	*Deposition of Melanie Montgomery (Texas)		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.
429.3	6/3/2020	*Melanie Montgomery Declaration		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.
430	8/2/2021	*Deposition of Bill Powers (Texas)		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.
430.1	6/3/2020	*Bill Powers Declaration		The NRA objects to AMc's use of this declaration as a substitute for live testimony at trial.
431	8/4/2021	*Deposition of Nader Tavangar (Texas)		The NRA objects to AMc's use of this transcript as a substitute for live testimony at trial.
431.1	6/3/2020	*Nadar Tavangar Declaration		The NRA objects to AMc's use of this declaration as a substitute for live testimony at trial.

432	3/26/2021	*Deposition of Bill Winkler (BR – 30(b)(6))		The NRA objects to AMc’s use of this transcript as a substitute for live testimony at trial.
432.1	3/26/2021	*Deposition of Bill Winkler (BR)		The NRA objects to AMc’s use of this transcript as a substitute for live testimony at trial.
432.2	6/3/2020	*Bill Winkler Declaration		The NRA objects to AMc’s use of this declaration as a substitute for live testimony at trial.
432.3	7/6/2021	*Bill Winkler Declaration		The NRA objects to AMc’s use of this declaration as a substitute for live testimony at trial.
432.4	11/29/2021	*Bill Winkler Declaration		The NRA objects to AMc’s use of this declaration as a substitute for live testimony at trial.
432.5	12/20/2021	*Bill Winkler Declaration		The NRA objects to AMc’s use of this declaration as a substitute for live testimony at trial.
433	7/30/2021	Deposition of Brandon Winkler		The NRA objects to AMc’s use of this transcript as a substitute for live testimony at trial.
433.1	12/20/2021	Brandon Winkler Declaration		The NRA objects to AMc’s use of this declaration as a substitute for live testimony at trial.
434	10/29/2021	*Deposition of Brian Buss		
434.1	6/1/2021	Expert Report of Brian Buss		
434.2	10/21/2021	Amended and Updated Report of Brian Buss		
435	10/21/2021	*Deposition of Andrew McLean		
435.1	6/1/2021	Expert Report of Andrew McLean		
435.2	10/18/2021	*Supplemental Report of Andrew McLean		

436	8/17/2021	Deposition of Gary Goolsby (Vol I)		
436.1	10/12/2021	*Deposition of Gary Goolsby (Vol II)		
436.2	6/1/2021	*Expert Report of Gary Goolsby		
436.3	8/16/2021	*Supplemental Expert Report of Gary Goolsby		
437	8/10/2021	*Deposition of Jonathan Hochman		
437.1	6/1/2021	*Expert Report of Jonathan Hochman		
437.2	10/22/2021	First Supplemental Expert Report of Jonathan Hochman		
438	8/13/2021	*Deposition of Matthew Klink		
438.1	6/15/2021	*Expert Report of Matthew Klink		
439	8/19/2021	*Deposition of Autumn Krause		
439.1	6/15/2021	*Expert Report of Autumn Krause		
439.2	7/15/2021	*Expert Report of Autumn Krause		
440	8/12/2021	*Deposition of Larry Kanter		
440.1	7/15/2021	*Expert Report of Larry Kanter		
441	4/6/2021	*AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Cotton)		
442	4/6/2021	*PM Transcript of Proceedings in BK No. 21- 30085-HDH-11 (Cotton / Frazer)		
443	4/7/2021	*AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Frazer)		
444	4/7/2021	**PM Transcript of Proceedings in BK No. 21- 30085-HDH-11 (Frazer / LaPierre)		
445	4/8/2021	*AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (LaPierre)		

446	4/8/2021	*PM Transcript of Proceedings in BK No. 21- 30085-HDH-11 (LaPierre / Stanford / Rowling)		
447	4/13/2021	*AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Rowling / Journey)		
448	4/13/2021	*PM Transcript of Proceedings in BK No. 21- 30085-HDH-11 (Journey / Spray		
449	4/16/2021	*AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Spray / Makris)		
450	4/16/2021	**PM Transcript of Proceedings in BK No. 21- 30085-HDH-11 (Makris / Winkler / Phillips (by transcript)		
451	4/20/2021	*AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Owen Mills / Roscoe Marshall / Esther Schneider / Phillips (by transcript))		
452	4/20/2021	*PM Transcript of Proceedings in BK No. 21- 30085-HDH-11 (Meadows (by transcript) / Hallow (by transcript))		
453	4/21/2021	*AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Lee)		
454	4/21/2021	*PM Transcript of Proceedings in BK No. 21- 30085-HDH-11 (Lee / King)		
455	4/22/2021	*AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Erstling / Wang / Schropp)		
456	4/22/2021	*PM Transcript of Proceedings in BK No. 21- 30085-HDH-11 (Schropp)		

457	4/23/2021	*AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Froman / Rowling)		
458	4/23/2021	*PM Transcript of Proceedings in BK No. 21- 30085-HDH-11 (Rowling)		
459	4/29/2021	*AM Transcript of Proceedings in BK. No. 21-30085-HDH-11 (Plotts / LaPierre)		



Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon counsel for Defendants via CM/ECF system on February 22, 2022.

/s/ Philip J. Furia

Philip J. Furia